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Direct Testimony of Fall River Fire Chief David L. Thiboutot

1 Q. Please state your name, current position and business address.

2 A. David L. Thiboutot, Fire Chief, Fall River, Massachusetts. My business address is
3 140 Commerce Drive, Fall River, MA

4 Q. For how long have you been involved with fire fighting and/or emergency
5 response activities?

6 A. For thirty-one (31) years.

7 Q. What is your educational background and, in particular, have you taken any
8 course work that is relevant to your current responsibilities in the area of fire and
9 emergency response?

10 A. I received an Associate of Fire Science Degree from Bristol Community College
11 in 1982 and a Bachelor of Fire Science Degree from Providence College in 1990.

12 Q. What is the purpose of your testimony in this proceeding?

13 A. It very much parallels that of Chief Souza of the Police Department. I too was
14 asked by Mayor Lambert to advise him about the implications of the Weaver's
15 Cove proposal for our community and for its residents.

16 Q. What did you know about the Weaver's Cove proposal at that time?

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1 A. Very little, certainly far less than I now appreciate. I knew that the intent was to
2 locate a large LNG facility on our waterfront and to supply it from tankers that
3 would travel through the in-land waters of Rhode Island and Massachusetts and
4 that obviously made me sensitive to the reality that we would be confronted with
5 a new, major chemical plant. Any time that occurs, it is a warning flag to fire
6 fighters because of the potential for fires that is unavoidable at such facilities. I
7 knew enough, therefore, to recognize that we were being threatened with a new
8 danger but I certainly did not then appreciate the extent of that danger. I have a
9 far greater appreciation of that today.

10 Q. How did you gain that appreciation?

11 A. Like Chief Souza I sought the advice of experts and through those consultations
12 and through my review of information that I received I began to gain an
13 awareness of the fire potential that would be associated with a release of LNG
14 from a containment facility. I began to appreciate that a release from containment
15 could occur not only at the on-shore facility that would sit in our waterfront, but
16 from one or more of the containment vessels on the tankers that would be
17 traveling close to our shorelines. I developed an understanding of the potential
18 ramifications of "pool" fires and the implications of vapor dispersion clouds, and
19 of the very intense thermal attributes of LNG-induced fires. Finally, I became
20 aware of the need that would exist to evacuate wide areas, of the potential for
21 second-degree burns and worse in exceedingly short time intervals, and of the

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1 complications of sympathy fires, or secondary fires that could be started by
2 exposure of flammable materials to the thermal levels that can be anticipated.

3 Q. Based upon the advice that you received, what did you assume about the nature of
4 the conflagration that might confront you and about the areas that would be in
5 jeopardy and might require evacuation?

6 A. I recognized that in the case of a spill of LNG a "pool" fire could occur at the
7 point of the spill and the surrounding area. This could either be contiguous to the
8 terminal, to a berthed tanker, or anywhere along the tanker route. I was advised
9 that because of the thermal characteristics of a "pool" fire persons within a one-
10 mile radius would be at jeopardy. Of course, structures within that radius would
11 be potential sources of additional ignition further compounding the task of fire
12 control and evacuation. I recognized that in the case of a vapor cloud
13 conflagration could occur at any point along that cloud where a flammable
14 mixture comes into contact with a source of ignition and that the resulting fire
15 could conceivably spread back to the original source of the leak. Once the vapor
16 cloud ignited, we would be confronted with the same difficulties associated with a
17 "pool" fire although the area of potential danger could be even more diffused.

18 Q. In the event of a "pool" fire, is it likely that you will be able to extinguish it or is
19 it likely that you will have to allow it to run its course?

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1 A. The latter. The heat intensity would preclude effective extinguishment. Fire
2 fighters, even with protective clothing, would be unable to get close enough to
3 allow their efforts at extinguishment to be effective.

4 Q. Chief Thiboutot, would the need to evacuate an area affect your ability to fight
5 and contain either a "pool" or vapor-dispersion related fire?

6 A. Absolutely, Chief Souza already has described the constricted traffic patterns that
7 would hinder rapid evacuation. Fire fighters, and emergency medical personnel
8 would at precisely the same time be required to utilize those same roadways, but
9 going in the opposite direction. I do not see how both efforts can simultaneously
10 be pursued successfully. Traffic accidents are a near certainty, further delaying
11 both evacuation and containment of any conflagration. The resulting chaos is
12 certain to frustrate both efforts and magnify the tragedy.

13 It is also important to recognize that with a fire as intense as that associated with
14 the ignition of LNG, the potential for it to ignite secondary fires across a far
15 broader area than the site of the initial spill, or of the initial ignition of a vapor
16 cloud fire, is substantial. My Department could find it necessary to wage a battle
17 against multiple fires simultaneously. Our resources could easily be
18 overwhelmed.

19 Q. Accepting that you might be called upon to deal with several fires simultaneously,
20 surely it is common for fire resources from neighboring Towns to pitch in when
21 there is such an emergency, is that not correct?

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1 A. It is absolutely correct and I have no doubt that they would want to be of
2 assistance. I doubt, however, that it would be possible to obtain much outside
3 help.

4 Q. Why do you despair of the availability of help from outside of Fall River?

5 A. Consider the situation that would exist on the ground at the time. People will not
6 just be fleeing the zone of maximum danger, it is natural to expect, indeed it is to
7 be hoped, that people will flee the City from well outside the immediate area of
8 conflagration, particularly so if it is believed, as everyone is sure to at the outset,
9 that the event was the result of a terrorist attack. With the wholesale evacuation
10 that I would anticipate, it is unrealistic to assume that fire and rescue equipment
11 from outside communities would be able to arrive in time to be of much help.

12 Q. With respect to the fire fighters that are able to get to the area of conflagration,
13 would it be necessary for them to wear any special protective equipment and how
14 might that affect their ability to fight the fires?

15 A. At a minimum, normal structural firefighting personal protective clothing would
16 be required. This basic equipment which would include boots, bunker pants,
17 bunker coat, helmet, hood, gloves, and self-contained breathing apparatus
18 (SCBA) weigh about 60 pounds. This type of equipment is standard and is
19 available on all Fall River apparatus. In the event that fire forces were required to
20 make an advance on flammable liquid / flammable gas type situations, proximity
21 protective clothing would be required under NFPA Standard 1971. At this time

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1 the City of Fall River does not own this type of equipment and it is only available
2 through the district hazmat team, which typically takes up to an hour to respond
3 into our city. All this equipment even if it were available does limit fire fighter
4 movement and would expose firefighters to excessively higher temperatures. The
5 other major limiting factor would be the amount of compressed air (SCBA)
6 available on fire apparatus. Typically outdoor type fire fighting does not require
7 the use of SCBA but high temperature flammable gas fires would require this use
8 at all times. The normal supply of air per unit is less than one hour per man per
9 truck. These circumstances would severely limit this department and any outside
10 mutual aid, from making an aggressive attack on the fire.

11 Q. Chief Thiboutot, are you familiar with the medical emergency response personnel
12 available in case of a major fire?

13 A. I am.

14 Q. Please describe the resources that are available to the City.

15 A. Currently the Fall River Fire Department has four Advanced Life Support
16 ambulances, which are staffed 24/7. Although there is mutual aid available from
17 surrounding towns, response would no doubt be hindered because of traffic
18 problems and the possibility that both bridges could be restricted or closed in this
19 disaster scenario.

20 Q. Assuming that every member of the rescue contingent, and all of their equipment
21 including ambulances, were already available at the site of an LNG conflagration

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1 at the precise moment of ignition, would they be able to cope successfully with
2 the aftermath?

3 A. Of course, you are asking that I address a most unrealistic hypothetical.
4 Nonetheless, the answer is no. At most our available rescue personnel could
5 administer aid to a group of eight but any number beyond that would sacrifice the
6 care to all. Keep in mind that the rescue personnel would be required to work in
7 an exceedingly hostile, dangerous environment. In a normal conflagration
8 situation the injured can be removed to a nearby area of safety and administered
9 to there. In the case of an LNG conflagration, there are no nearby areas of safety.
10 As a consequence, emergency personnel would themselves have to be burdened
11 with the need to wear protective gear making their activities that much more
12 difficult. Our ability to move people would also be limited by the fact that those
13 people would themselves require full protective equipment.

14 I must also address the unrealistic assumption included in your question. I
15 recognize that it was included to make the point that even assuming an ideal set of
16 circumstances the consequences to human health and suffering could be
17 cataclysmic. What the Commission must understand is that, precisely because of
18 the mass exodus that would be occurring across a broad geographic area, it would
19 be highly unrealistic to assume that even most of the available emergency medical
20 resources would be able to get to the scene of the conflagrations in sufficient time
21 to do much immediate good.

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1 Q. Finally, Chief Thiboutot, are you familiar with the emergency room, emergency
2 treatment and burn treatment resources that are available in the City of Fall River
3 and the reasonable surrounding area?

4 A. I am.

5 Q. Would you please describe for us the extent of those resources and their ability to
6 handle the medical emergencies that might be associated with the release and
7 subsequent conflagration of LNG?

8 A. The two hospitals in the city have a relatively small bed capacity, St. Anne's has
9 160 beds and Charlton Memorial has 364 beds. These beds are typically full year
10 round. Neither hospital is a level One Trauma Center nor do they have burn units.
11 Each hospital does have the capability of treating approximately 50 burn patients
12 with their burn cots. In an event of any consequence these resources would be
13 quickly overwhelmed.

14

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

Weaver's Cove Energy, L.L.C. and
Mill River Pipeline, L.L. C.

Docket Nos. CP04-36-000, CP04-41-000,
CP04-42-000, and CP04-43-000

DECLARATION OF WITNESS

I, David L. Thiboutot, declare under penalty of perjury that the statements contained in the Prepared Direct Testimony of David L. Thiboutot on behalf of the City of Fall River and the Attorney General of the Commonwealth of Massachusetts in this proceeding are true and correct to the best of my knowledge, information, and belief.

Executed on this 7th day of June, 2005.


David L. Thiboutot